

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**Professional Fee Matters Concerning the
Jackson Walker Law Firm**

Case No. 23-645

JOINT NOTICE REGARDING A HEARING ON MOTIONS TO STRIKE

[Relates to ECF Nos. 569, 570, 571, 574, and 577]

TO THE HONORABLE EDUARDO V. RODRIGUEZ
CHIEF UNITED STATES BANKRUPTCY JUDGE:

Kevin M. Epstein, the United States Trustee for the Southern District of Texas (“U.S. Trustee”), and Jackson Walker LLP (“Jackson Walker”) (collectively, the “Parties”) file this joint notice regarding a hearing on the following pending motions:

- a. *United States Trustee’s Motion to Strike Rebuttal Expert Report and Exclude Expert Opinion Testimony of Renee Knake Jefferson* [ECF No. 569];
- b. *Jackson Walker LLP’s Motion to Strike the Report and to Exclude the Opinions of Richard J. Davis* [ECF No. 570];
- c. *Jackson Walker LLP’s Motion to Exclude the Opinions and Testimony of Jonathan C. Lipson* [ECF No. 571]; and
- d. *Jackson Walker LLP’s Motion to Strike the Supplemental Report of Jonathan C. Lipson* [ECF No. 574]

(collectively, the “Motions to Strike”).

On February 7, 2025, the Court entered an *Order* [ECF No. 577], wherein the Court stated it would conduct an evidentiary hearing on the Motions to Strike and ordered the U.S. Trustee and Jackson Walker to file a joint notice that answers certain questions. The parties have met and conferred twice but have been unable to reach an agreement in response to the Court’s inquiries. As such the Parties answer as follows:

1. The total overall amount of time the Parties will require for a hearing on the Motions:
 - a. The U.S. Trustee anticipates 4 hours.
 - b. Jackson Walker anticipates 1 hour, and expects the parties' submissions will include legal argument only. Based on the motions filed by both parties, Jackson Walker believes witness testimony is unnecessary.
2. Whether the Parties would prefer an in person hearing in Houston, Texas; electronic hearing only or a hybrid:
 - a. The parties request an in-person hearing in Houston, but with electronic appearance of other parties and witnesses permitted.
3. Any other accommodation the Parties may require:
 - a. The U.S. Trustee requests a hearing at the Court's earliest available date.
 - i. The U.S. Trustee advises that his expert, Mr. Davis, is not available on March 17, 2025, until after 12:00 p.m. CT.
 - ii. The U.S. Trustee further advises that his expert, Mr. Lipson, is not available on March 13, 14, 27 and 28, 2025. Mr. Lipson teaches classes at Temple University School of Law on Tuesdays and Thursdays from 12:30 to 3:30 p.m. CT and on Wednesdays from 11:00 a.m. to 2:00 p.m. CT.

The U.S. Trustee prefers and may seek permission for his experts to testify remotely in accordance with BLR 9017-1.

- b. Jackson Walker requests a hearing at the Court's earliest available date.
 - i. Jackson Walker advises that its expert, Ms. Jefferson is unavailable on February 24; after 2:30 pm on February 25; before 12:00 p.m. on March 3; or after 12:00 pm on March 18. Ms. Jefferson is also unavailable March 20-28, as she will be traveling in Europe.

Jackson Walker may also seek permission for its expert to testify remotely in accordance with BLR 9017-1.

Date: February 17, 2025

Respectfully Submitted,

**OFFICE OF THE UNITED STATES
TRUSTEE**

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic means for CM/ECF system users on February 17, 2025.

/s/ Emily Smith

Emily Smith